

EXHIBIT A

Email Exchange Ending September 16, 2024

Reingold, Steven C.

From: Reingold, Steven C.
Sent: Monday, September 16, 2024 9:37 AM
To: Winick, Steven H.
Cc: Garfinkle, Jeffrey K.; Jason Powell; Miller, Evan T.; Novick, Michelle G.; Topper, Paige
Subject: RE: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

Steve:

Thank you for your email.

We appreciate the proposal and look forward to receiving the documents referenced. However, the proposal falls short of what we requested during the meet and confer; in fact, it wholly ignores part of the discussion. Specifically, we asked for internal communications regarding products that McKesson received but did not pay for, whether or not the failure to pay related to the recall. To that end, we asked that McKesson identify custodians and provide a list of search terms that would be applied to those custodians' communications. Producing selected documents that "itemize" or "detail" certain amounts does not suffice.

Please send us the names of the custodians and the search terms by the close of business on Wednesday. If we do not receive what we requested by then, we will conclude that McKesson has refused to comply with its discovery obligations and will bring the matter to the Court's attention.

Steven

Steven C. Reingold

Partner

SAUL EWING LLP | Boston

Office: (617) 912-0940 Cell: (617) 838-1311

From: Winick, Steven H. <swinick@buchalter.com>
Sent: Friday, September 13, 2024 7:39 PM
To: Reingold, Steven C. <Steven.Reingold@saul.com>
Cc: Garfinkle, Jeffrey K. <jgarfinkle@Buchalter.com>; Jason Powell <JPowell@delawarefirm.com>; Miller, Evan T. <evan.miller@saul.com>; Novick, Michelle G. <Michelle.Novick@saul.com>; Topper, Paige <paige.topper@saul.com>
Subject: RE: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

Dear Steven,

Further to our meet and confer, we are agreeable to producing the following within the next two weeks:

- a. Documents that itemize at an invoice level the products McKesson purchased from Akorn that remain unpaid.
- b. Documents that itemize McKesson's inventory of products that were subject to Akorn's recall.

- c. Documents that itemize the products that customers returned to McKesson or which we credited to customers or third parties related to the recall.
- d. Documents that detail our destruction costs.
- e. Documents that detail our cover costs.
- f. Documents that detail all other setoffs.

I previously provided to you summary numbers for these categories. Our document production will provide the support for these categories. Categories a-c will come from McKesson's SAP system. It will be large files of data that detail the referenced subjects.

In addition, we will identify a person responsible from McKesson who can speak to each of the subject areas listed above.

This production is without prejudice to the Trustee seeking additional documents following the production. We believe this will provide the Trustee with sufficient information to cross-check our calculations.

Please let me know if you would like to discuss this, or you have any comments or questions.

Thanks,

Steve Winick

Buchalter

Steven H. Winick

Special Counsel

T (415) 227-3573

C (650) 219-8413

swinick@buchalter.com

425 Market Street, Suite 2900

San Francisco, CA 94105

www.buchalter.com

From: Reingold, Steven C. <Steven.Reingold@saul.com>

Sent: Friday, September 13, 2024 7:25 AM

To: Winick, Steven H. <swinick@buchalter.com>

Cc: Garfinkle, Jeffrey K. <jgarfinkle@Buchalter.com>; Jason Powell <JPowell@delawarefirm.com>; Miller, Evan T. <evan.miller@saul.com>; Novick, Michelle G. <Michelle.Novick@saul.com>; Topper, Paige <paige.topper@saul.com>

Subject: RE: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

This message has originated from an **External Email**. steven.reingold@saul.com <steven.reingold@saul.com>:

At the conclusion of last Thursday's meet and confer, we asked you to get back to us early this week with your proposal regarding your clients' discovery responses. We have not heard anything from you.

Please get back to us today with a substantive proposal. If you do not, or if we receive a proposal that is not substantive, we will so inform the Trustee and will take the steps necessary to compel responses.

Steven C. Reingold

Partner

SAUL EWING LLP | Boston

Office: (617) 912-0940 **Cell:** (617) 838-1311

From: Reingold, Steven C.

Sent: Friday, August 30, 2024 5:46 PM

To: Winick, Steven H. <swinick@buchalter.com>

Cc: Garfinkle, Jeffrey K. <jgarfinkle@Buchalter.com>; Jason Powell <JPowell@delawarefirm.com>; Miller, Evan T. <evan.miller@saul.com>; Novick, Michelle G. <michelle.novick@saul.com>; Topper, Paige <paige.topper@saul.com>

Subject: RE: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

Yes. I will send the invitation.

Steven C. Reingold

Partner

SAUL EWING LLP | Boston

Office: (617) 912-0940 **Cell:** (617) 838-1311

From: Winick, Steven H. <swinick@buchalter.com>

Sent: Friday, August 30, 2024 5:43 PM

To: Reingold, Steven C. <Steven.Reingold@saul.com>

Cc: Garfinkle, Jeffrey K. <jgarfinkle@Buchalter.com>; Jason Powell <JPowell@delawarefirm.com>; Miller, Evan T. <evan.miller@saul.com>; Novick, Michelle G. <Michelle.Novick@saul.com>; Topper, Paige <paige.topper@saul.com>

Subject: Re: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

Thursday at 2:00 pm. Does that work?

Steve Winick

Cell: 650.219.8413

Buchalter

Steven H. Winick

Special Counsel

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On Aug 30, 2024, at 2:41 PM, Reingold, Steven C. <Steven.Reingold@saul.com> wrote:

This message has originated from an **External Email**. steven.reingold@saul.com <steven.reingold@saul.com>:

May I hear from you?

Steven C. Reingold

Partner

SAUL EWING LLP | Boston

Office: (617) 912-0940 **Cell:** (617) 838-1311

From: Reingold, Steven C.

Sent: Thursday, August 29, 2024 6:36 PM

To: Winick, Steven H. <swinick@buchalter.com>; Garfinkle, Jeffrey K. <jgarfinkle@Buchalter.com>; Jason Powell <JPowell@delawarefirm.com>

Cc: Miller, Evan T. <evan.miller@saul.com>; Novick, Michelle G. <michelle.novick@saul.com>; Topper, Paige <paige.topper@saul.com>

Subject: RE: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

Steve:

As of now I am free Wednesday between 12:30 and 4:00 and between 5:00 and 6:00, and Thursday between 1:00 and 5:00 (all times Eastern).

Please share your availability and I will send an invitation.

Steven

Steven C. Reingold

Partner

SAUL EWING LLP | Boston

Office: (617) 912-0940 **Cell:** (617) 838-1311

From: Winick, Steven H. <swinick@buchalter.com>

Sent: Thursday, August 29, 2024 6:14 PM

To: Reingold, Steven C. <Steven.Reingold@saul.com>; Garfinkle, Jeffrey K. <jgarfinkle@Buchalter.com>; Jason Powell <JPowell@delawarefirm.com>

Cc: Miller, Evan T. <evan.miller@saul.com>; Novick, Michelle G. <Michelle.Novick@saul.com>; Topper,

Paige <paige.topper@saul.com>

Subject: RE: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

****EXTERNAL EMAIL** - This message originates from outside our Firm. Please consider carefully before responding or clicking links/attachments.**

Dear Steven,

I can meet and confer next week on Wednesday or Thursday. What time availability do you have?

Steve

Buchalter

Steven H. Winick

Special Counsel

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From: Reingold, Steven C. <Steven.Reingold@saul.com>

Sent: Tuesday, August 20, 2024 1:44 PM

To: Garfinkle, Jeffrey K. <jgarfinkle@buchalter.com>; Winick, Steven H. <swinick@buchalter.com>; Jason Powell <JPowell@delawarefirm.com>

Cc: Miller, Evan T. <evan.miller@saul.com>; Novick, Michelle G. <Michelle.Novick@saul.com>; Topper, Paige <paige.topper@saul.com>

Subject: George Miller, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC et al. v. McKesson Corporation et al., Adv. Proc. No. 24-50042 (KBO)

This message has originated from an External Email . steven.reingold@saul.com < steven.reingold@saul.com >:
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Gentlemen:

Please see the attached letter.

Thank you.

Steven

Steven C. Reingold

Partner

SAUL EWING LLP | Boston

Office: (617) 912-0940 **Cell:** (617) 838-1311

"Saul Ewing LLP (saul.com)" has made the following annotations:

+~~~~~+

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